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11 Attorneys for United States of America

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,) NO. CR 16-00227 SI
17 Plaintiff,)
18 v.) STIPULATION TO EXCLUDE TIME FROM
19 BTC-E, A/K/A CANTON BUSINESS) AUGUST 15, 2022 TO SEPTEMBER 27, 2022 AND
CORPORATION,) [PROPOSED] ORDER
20 and)
21 ALEXANDER VINNIK,)
22 Defendants.)
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25 It is hereby stipulated by and between counsel for the United States and counsel for the
26 defendant Alexander Vinnik that time be excluded under the Speedy Trial Act from August 15, 2022,
27 through September 27, 2022.

28 At the status conference held on August 15, 2022, the government and counsel for the defendant

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
Case No. CR 16-00227 SI

v. 7/10/2018

agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing discovery. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until September 27, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from August 15, 2022, through September 27, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: August 22, 2022

/s/
CLAUDIA QUIROZ
Assistant United States Attorney
C. ALDEN PELKER
Trial Attorney, CCIPS

DATED: August 22, 2022

/s/
DAVID RIZK
Counsel for Defendant Alexander Vinnik

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on August 15, 2022, and for good cause shown, the Court finds that failing to exclude the time from August 15, 2022, through September 27, 2022, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from August 15, 2022, to September 27, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from August 15, 2022, through September 27, 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §

1 3161(h)(7)(A), (B)(iv).

2 IT IS SO ORDERED.

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4 DATED: _____

5 HON. SUSAN ILLSTON
United States District Judge

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